

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA,

Plaintiff,

v.

J.B., a minor; Z.B., a minor; and ANNIE L.
DAVIS, solely in her capacity as guardian of
J.B. and Z.B., and MARILYN DAVIS,

Defendants.

Civil Action No.: 0:18-cv-03189-DSD-ECW

**PRUDENTIAL'S MEET & CONFER
STATEMENT IN SUPPORT OF
PRUDENTIAL'S MOTION FOR
APPOINTMENT OF A GUARDIAN AD
LITEM AND FOR DEPOSIT
PURSUANT TO FED. R. CIV. P. 67**

I, Joyce Min, hereby certify as follows:

1. I am an attorney-at-law in the State of New Jersey and am associate of the law firm of d'Arcambal Ousley & Cuyler Burk, LLP, (the "Firm" or "DOCB"). DOCB is national co-ordinating counsel for Plaintiff, The Prudential Insurance Company of America ("Prudential") with regard to interpleader matters, such as the instant case. DOCB retained Berens & Miller, P.A. as local counsel for Prudential in this matter. I am familiar with the matters hereinafter stated.


2. Pursuant to Local Rule 7.1, on or about December 18, 2018, March 15, 2019, and June 25, 2019, I met and conferred with Michael Hoover, Esq., counsel for J.B. and Annie L. Davis ("Annie") regarding the instant motion. Mr. Hoover indicated that Annie is willing to be appointed as guardian *ad litem* for Defendant, J.B. without seeking compensation. He further indicated that while Annie consents to the appointment of a guardian *ad litem* for Z.B., she opposes the appointment of a guardian *ad litem* for J.B. Counsel for Annie Davis intends to file a response brief explaining Annie's position to the Court.

3. On June 5, 2019, counsel for J.B. reportedly received a communication from the Hennepin County Attorney's Office that there has been no criminal complaint or delinquency petition

filed against Z.B. but the case has not yet been closed.

Pursuant to 28 U.S.C. §1746, I hereby declare, under penalty of perjury, that the foregoing is true and correct.

Dated: 6/27/19



Joyce Min